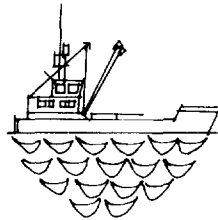


NORTHERN OYSTER COMPANY



P.O. Box 365 Ocean Park, WA 98640 206/665-4886

April 9, 1999

6358 '99 APR 16 19:54

William K. Hubbard  
Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

In re: Federa Register request for information:  
Standard for vibrio-vulnificus  
Docket # 98P-0504 volume 64, number 13, page 3300-3301

Dear Mr. Hubbard:

Proposals contained within the CSPI petition if carried through will completely eliminate our company from its only business; growing Pacific Oysters.

Northern Oyster Company is a family business in its fourth generation and one of the oldest shellfish operations on the West Coast.

We are in a constant battle with local and state bureaucrats to maintain the water quality of Willapa Bay; the cleanest estuary left in our nation. The zero tolerance for vibrio vulnificus being pushed by CSPI, coupled with the recent findings that it is and has been naturally present historically in all shellfish areas, should lead to a fairly obvious conclusion. The lack of past problems do not support a radical destructive action as proposed by CSPI.

The Pacific Coast Oyster Growers Association is our representative in this issue. We fully support the actions proposed by our organization.

ISSC was specifically created to deal with this type of problem. We have supported this organization and regulations developed for public protections and ours. ISSC is the forum that should deal with this issue.

Please give this letter your serious consideration.

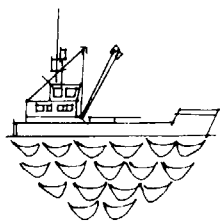
Respectfully,

A handwritten signature in cursive script that reads "Dick Sheldon".

Dick Sheldon,  
President  
N.O.C.O.

98P-0504

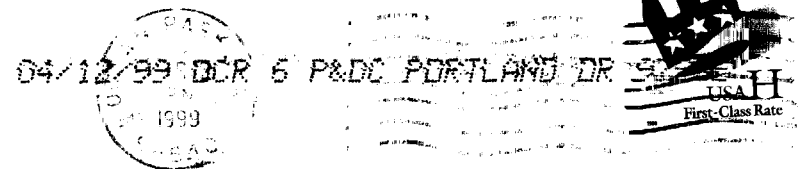
CS4



NORTHERN OYSTER COMPANY

*P.O. Box 365 Ocean Park, WA 98640*

William Hubbard  
Dockets Mgmt Br (HFA-305)  
Food & Drug Assn.  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852



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